

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Revision of the Commission's Rules)	
To Ensure Compatibility with)	CC Docket No. 94-102
Enhanced 911 Emergency Calling Systems)	
)	
)	

To the Chief, Wireless Telecommunications Bureau:

Reply Comments of
TRAXSIS, INC.

Washington Federal Strategies on behalf of Traxis, Inc.¹ hereby respectfully submits these Reply Comments in response to a Public Notice issued by the Wireless Telecommunications Bureau of the FCC, DA 01-2187, released September 19, 2001 which sought comment on a Wireless E911 Phase II amended waiver request filed by AT&T Wireless Services, Inc. ("AT&T"). Through these Reply Comments, Traxis requests the Commission to condition any waiver granted upon AT&T's thorough exploration of all options for deployment of automatic location identification, to minimize any delay that might result should AT&T fail to reach agreements for deployment of services in its TDMA-based areas.

I. Statement of Interest

¹ Traxis, Inc. is a software company based in Burlingame, California. Its founders worked together at the Stanford University GPS Lab before founding the company. The company used their knowledge of precise location determination to develop the current ALI solution. The company's website is www.traxis.com.

Traxis, Inc. is a company that has developed a software solution that wireless carriers can use to comply with Phase II Automated Location Information requirements. Traxis is working in conjunction with CSI Wireless and Audiovox to develop an end to end solution to the Phase II ALI requirements that is customized for TDMA networks. Traxis's solution is available either as an application service provided by Traxis or as an addition to the carrier's infrastructure. The Traxis system utilizes multiple sensor measurements to produce a hybrid solution that offers superior accuracy and availability.

As a company that develops solutions to address wireless carriers need to comply with the Commission's E911 regulations, Traxis encourages the Commission to act in this matter in a way that fosters the rapid deployment of E911 solutions.

Traxis is filing these Reply Comments in the wake of the Commission's Orders granting modifications to the scheduled deployment of Phase II E911 technologies for several wireless carriers.²

II. Discussion

In the Commission's *October Orders*, the FCC determined that it was appropriate to modify the Phase II automatic location information implementation schedules for several nationwide wireless carriers including AT&T.³ In light of the Commission's actions, the request by AT&T to revise its waiver request to shift technologies that AT&T was considering deploying in its TDMA-based markets took on new significance. AT&T has, as the Commission allows, made modifications to its plans for Phase II E911 deployment. The current waiver request, however, notes that AT&T has not concluded negotiations

² *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Orders, FCC 01-293, FCC 01-294, FCC 01-295, FCC 01-296, FCC 01-297, FCC 01-299, released October 2, 2001. (The "*October Orders*")

with the two network overlay technology firms that it is considering. Should AT&T not reach agreement with either company, or if it should determine that one or the other technology is inadequate to the task, the deployment of Phase II ALI for AT&T's customers could be significantly delayed.

To assist in the deployment of this vital public safety technology, Traxis urges the Commission to condition any waiver on a commitment by AT&T to continue exploring additional technologies that might be deployed promptly. Traxis' ALI solution, particularly the handset solution co-developed with CSI Wireless and Audiovox offers a wireless carrier the opportunity to meet the more specific handset standards, which can improve the chances of locating citizens in need of emergency aid. Traxis recognizes that all of these technologies are evolving, which may be a reason that carriers have had difficulty reaching closure with companies offering solutions. If immediate deployment is not possible, then full exploration of possible solutions may be the key to more rapid deployment of Phase II ALI technologies. Traxis is prepared to discuss its solution with carriers and to follow up with demonstrations of its TDMA-based ALI solution. It seems contrary to the public interest to delay deployment of Phase II ALI because some solution providers may not reach agreements with carriers. It is hoped that carriers would not be able to hide behind failed negotiations as a means of delaying Phase II ALI deployment. Traxis hopes to fill the void by offering expert ALI technology in a timely fashion.

In this case, AT&T has made a showing that justifies the grant of a waiver. However, the uncertainty with respect to the negotiations with technology providers leaves a gap that the Commission might wish to fill by putting conditions on a waiver it might grant.

³ *Id.*

Some carriers and even the Cellular Telecommunications and Internet Association have observed on a lack of technological solutions in filings in this proceeding. There are more solutions available than have been fully explored, and those solutions could be providing vital location data to public safety answering points, helping citizens in trouble. Traxis believes that the best way to encourage adoption of Phase II ALI is to provide some flexibility in the use of the available technologies. It is Traxis's hope that rapid deployment of technology will not only serve the public by saving lives but will also help with the introduction of new, valuable location services to wireless customers.

III. Conclusion

Traxis can customize its solution to the needs of each carrier, and it is prepared to work with carriers immediately to help them to comply with the Commission's requirements. Accordingly, Traxis respectfully submits these Reply Comments with regard to the revised waiver request filed by AT&T Wireless Services, Inc.

Respectfully Submitted

Traxis, Inc.

/s/

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